

Judge: Timothy W. Dore  
Chapter: 13  
Hearing Date: April 19, 2017  
Hearing Location:  
US Bankruptcy Court  
700 Stewart Street  
Courtroom 8106  
Seattle WA 98101  
Time: 9:30AM

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON**

In re:

JULIAN FLORES,

Debtor.

CHAPTER 13 PROCEEDING  
NO. 11-20512-TWD

DEBTOR'S RESPONSE TO CREDITOR'S  
MOTION FOR RELIEF FROM STAY AND  
CO-DEBTOR STAY RE: 2007 CHEVROLET  
EXPRESS CA

Debtor, Julian Flores, by and through his attorney, Lisa S. Tse, hereby replies to the Creditor's Motion for Relief from Stay and Co-Debtor Stay re: 2007 Chevrolet Express CA. In support thereof, Debtor states the following:

1. The plan filed on February 14, 2012 appears to provide Ally Financial \$100 monthly for a 2008 Chevrolet Cargo Van, presumably the abovementioned 2007 Chevrolet Express CA. Debtor listed the value of the collateral at \$16,450 with an amount owing to Ally Financial of \$15,294.49 as listed on the schedules.

Debtor's Response to Motion for Relief of  
Stay - 1

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2. This appears to be a 100% payment to unsecured creditors, though there appears to be an asterisk indicating that Debtor is unable to pay unsecured creditors at 100% as indicated in XII.4.

3. Debtor's plan is nearing completion without the payment to Ally Financial in full. Debtor cannot make full payment of the vehicle within a couple of months for the large amount owed. Debtor is requesting that if his Chapter 13 Plan cannot remain open, he wishes to make payments to Ally Financial for the vehicle.

WHEREFORE, Debtor respectfully requests the Court to deny the creditor's Motion for Relief of Stay.

DATED, this 12<sup>th</sup> day of April, 2017.

/s/ Lisa S. Tse  
***Attorney for Debtor***  
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Debtor's Response to Motion for Relief of Stay - 2

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